

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO: 16-00106-RLW-1
)	
JAMES BOWEN,)	
)	
Defendant.)	

MOTION FOR EXTENSION

COMES NOW the Defendant, by and through his attorney, Ethan Skaggs, Assistant Federal Public Defender for the Southern District of Illinois, and for his Motion for Extension states as follows:

1. The Officer of the Federal Public Defender for the Southern District of Illinois was appointed to assist the Defendant with a possible motion for Compassionate Release.
2. Counsel intends to file a supplemental motion for compassionate release on behalf of the Defendant. Counsel continues to communicate with the Defendant regarding a supplemental motion. Based upon the continued (and recent) communications, Counsel is seeking additional information and records to complete the supplemental motion.
3. Counsel needs an extension of time to complete a supplemental motion for compassionate release to file on the Defendant's behalf.
4. No party will be prejudiced if the period of time to file supplemental pleadings is extended to March 23, 2021.
5. The Government has informed Counsel they do not object to this motion.

WHEREFORE, Defendant prays that this Honorable Court grant his Motion for Extension and allow the Defendant until March 23, 2021 to file a supplemental pleading in this matter.

Respectfully submitted,

/s/ Ethan Skaggs

ETHAN SKAGGS

Assistant Federal Public Defender

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(618) 482-9050

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has caused a true and correct copy of the foregoing to be served upon the assigned Assistant United States Attorney, Southern District of Illinois, via electronic filing with the Clerk of the Court using the CM/ECF system on February 24, 2021.

/s/ Ethan Skaggs